

FILED

MAR 21 2012

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

1 MELINDA HAAG (CABN 132612)  
United States Attorney  
2  
3 MIRANDA KANE (CABN 150630)  
Chief, Criminal Division  
4 ANDREW P. CAPUTO (CABN 203655)  
Assistant United States Attorney  
5 450 Golden Gate Ave., Box 36055  
San Francisco, California 94102  
6 Telephone: (415) 436-7200  
Fax: (415) 436-7234  
7 E-Mail: andrew.caputo@usdoj.gov

8 Attorneys for Plaintiff

9  
10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA, ) No. 3-12-70282 NC  
14 Plaintiff, )  
15 v. ) STIPULATION REQUESTING  
16 RAJARSHI CHOWDHURY, ) PROTECTIVE ORDER, AND  
17 Defendant. ) [PROPOSED] ORDER

19  
20 The parties respectfully stipulate as follows:

21 1. The United States wishes to turn over discovery materials in this matter to counsel  
22 for defendant Rajarshi Chowdhury. These materials necessarily include information relating to  
23 the charged extortion. The government believes that public disclosure of some of the  
24 information relating to the charged extortion would cause harm to victims in the case.

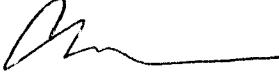
25 Accordingly, the United States respectfully asks the Court to enter the protective order set forth  
26 below.

27 2. Defendant's counsel stipulates to entry of the proposed protective order set forth  
28 below.

STIP. REQUESTING PROTECTIVE ORDER, AND [PROPOSED] ORDER  
3-12-70282 NC

1       3. Accordingly, the parties respectfully ask the Court to enter the proposed protective  
2 order set forth below.

3  
4 DATED: March 21, 2012

  
5 GARRICK S. LEW  
Attorney for Defendant

6  
7 DATED: March 21, 2012

  
8 ANDREW P. CAPUTO  
Assistant United States Attorney

9  
10 [PROPOSED] PROTECTIVE ORDER

11       The United States has moved for a protective order limiting the uses to which discovery  
12 materials in this case may be put. The Court finds that there is good cause for issuance of such a  
13 protective order. Therefore, **IT IS ORDERED THAT:**

14       1. The contents of the discovery materials in this case shall not be disclosed in any  
15 form to any other person by defense counsel except to the client, any investigator(s) for the client,  
16 and any other members of defendant's trial team including expert witnesses, and then only for the  
17 specific purposes relating to defending the client in this case.

18       2. Unless expressly authorized by this Court, no information derived from the  
19 discovery materials which are the subject of this order may be disclosed to any individual or  
20 entity for any other use.

21       3. This Order applies to all attorneys associated with the above case who have  
22 knowledge of this Order regardless of the nature of their involvement in the case. This Order  
23 shall be binding on all subsequent attorneys who represent the defendant in this case or any other  
24 person who comes into possession of the discovery materials disclosed pursuant to this Order.

25       4. All persons who come into possession of the discovery materials disclosed  
26 pursuant to this Order are required to advise any other persons receiving disclosure of any of the  
27 discovery materials of the terms of this Order.

28       5. A willful violation of this Order shall constitute a criminal contempt of Court for

1 which sanctions are provided by law. The parties who agree to receive information which is  
2 subject to this Order agree that this Court has jurisdiction to enter this Order.

3  
4 Dated: 3/21/2012

  
5 NATHANAEL COUSINS  
United States Magistrate Judge

6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28